

# Nicoletti Gonson Spinner

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December 12, 2019

**VIA ECF**

Hon. Jesse E. Furman  
United States District Court  
Southern District of New York  
Thurgood Marshall  
40 Foley Square  
New York, New York

Re: CARR MASSI, Individually and on Behalf of All Others Similarly Situated  
vs. DANIELA SALVONI, YAIR MARTIN GUTTMAN, AND JAI  
MUKTINATH INC. dba SUBWAY  
Venue : USDC SDNY No.:1:19-cv-10097-JMF  
Our File : 70308.00070

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Dear Judge Furman:

This office has just been retained to represent the interests of the Defendant, JAI MUKTINATH INC. dba SUBWAY, in the above-referenced matter. We write to respectfully request an extension of time in order to respond to the Summons and Complaint filed herein.

The undersigned recently received this claim and additional time is needed to consult with our client and to prepare a response to the Complaint. Under the circumstances, we respectfully request an extension of time to January 13, 2020.

We have contacted counsel for the Plaintiff who has advised that they would consent to an extension of time until that date.

No prior application has been made for this relief.

We appreciate the court's consideration of this request.

Respectfully submitted,

NICOLETTI GONSON SPINNER

  
Kevin M. Ryan, Esq.

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KMR:mc

**VIA ECF**  
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